

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

) GEN Docket No. 90-314
) ET Docket No. 92-100
)
) RM-7140, RM-7175, RM-7617,
) RM-7618, RM-7760, RM-7782,
) RM-7860, RM-7977, RM-7978,
) RM-7979, RM-7980
)
) PP-35 through PP-40, PP-79
) through PP-85

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS

Home Telephone Company ("Home Telephone") hereby submits its comments in response to the Commission's Notice of Proposed Rule Making and Tentative Decision in the captioned proceeding, FCC 92-333, released August 14, 1992 ("Notice"). Home Telephone is a locally owned, independent local exchange carrier providing service in certain areas of South Carolina. For the reasons set forth below, Home Telephone advocates the rapid deployment of personal communications services ("PCS") technology and the full participation of local exchange carriers as fostering the goals of the Commission and the Communications Act.

The Geographic service areas for PCS should be the same as those used by the Commission for cellular and interactive video and data services.

The Commission advances four options for the size of PCS license areas, the

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smallest being 487 "Basic Trading Areas" and the largest being nationwide.¹ Home Telephone contends that all four options involve areas that are unnecessarily large for the nature of the PCS offering. The Commission should look instead to the most appropriate and logical solution, which is the 734 MSA and RSA geographic delineations that the Commission currently uses for cellular service and Interactive Video and Data Service licensing. Commissioner Quello advocated serious consideration of the MSA and RSA designations.²

A number of compelling reasons exist for implementing these smaller service areas for PCS. First, PCS technology with its use of microcells provides the capability of tailoring service to such smaller areas and, therefore, licensing of such areas is feasible. Second, they are the only option that recognizes the difference between metropolitan and non-metropolitan areas. Third, MSA and RSA designations will likely encourage broader participation in providing PCS, particularly by entities that are only interested in or have the resources to provide service to small areas. The Commission itself recognizes the likely benefit.³ Such participation would likely result in quicker dissemination of PCS to non-metropolitan areas of the country. It should also yield greater diversity and broader technical and service innovation than could be expected from a smaller number of regional or nationwide providers. The Commission also

¹Notice at para. 60.

²Separate Statement of Commissioner James H. Quello, Re: Amendment of the Commission's Rules to Establish New Personal Communication Services, Erratum, released August 14, 1992.

³Notice at para. 59.

recognizes this as a potential benefit.⁴ If all of these benefits were realized, they would enhance the Commission's goals for PCS, particularly encouraging competition, deploying new technologies, and universality.

Local exchange carriers should not be precluded from providing PCS in their own telephone service areas.

The Commission tentatively concluded that there is a strong case for allowing local exchange carriers to provide PCS in their own exchange service areas.⁵ Home Telephone agrees with the Commission's conclusion and urges the Commission to allow local exchange carriers to offer PCS in this manner.

One of the most compelling arguments for this policy is the universal service obligations of all local exchange carriers. As technological advances have been made in this field, they have been implemented by the local exchange carriers, and have brought the telephone system from its inception using operator-assisted manual switchboards to the present fully automated digital system. The public has benefitted every step of the way. PCS is another new technology that can dramatically improve local exchange service if the local exchange carriers, who are the most qualified and therefore most logical providers, are not prohibited from participation by regulatory constraints. The Commission acknowledged that PCS will likely first complement local

⁴Id.

⁵Notice at para. 75.

exchange service and later become a full fledged competitor.⁶ The local exchange carriers must be allowed to deploy this new technology if they are to continue to meet their universal service obligations.

By their participation in PCS, local exchange carriers will facilitate the rapid availability and economical deployment of PCS due to their resources and expertise. Exchange carriers have: (1) expertise in providing existing telecommunications services, (2) the infrastructure in place, (3) the financial resources, and (4) the public service commitment to effectively and efficiently bring PCS to the public throughout the nation, in both metropolitan and non-metropolitan areas. Utilization of these resources would foster the Commission's stated goals of universality, speed of deployment and competitive delivery of PCS.

Local exchange carrier provision of PCS would also enhance the utilization of the public switched network by increasing its capability and efficiency. Just as the technological evolution of the network and local exchange service has benefitted both customers and all providers, including interexchange, cellular, and local exchange carriers, so too will local exchange carrier participation in the deployment of PCS enhance these carriers' ability to support all PCS providers' needs and facilitate the interoperability of different PCS systems. Development of compatible PCS systems will mean that any PCS customer can use a PCS device from any location. This is critical to the universality of PCS. In addition, exchange carrier participation and utilization of the exchange network will result in integration of PCS with that network. Such

⁶Notice at para. 71.

integration will allow PCS customers to utilize many intelligent network features of the public switched network. For all these reasons, local exchange carrier participation will assure that PCS will be brought to the marketplace as quickly as possible.

Local exchange carrier provision of PCS will benefit local exchange customers. As stated above, exchange carriers have historically implemented new technology as part of their universal service and public interest obligations. This has resulted in not only vast improvements in service and enhanced offerings but also greater efficiencies and lower costs to customers. Deployment of PCS is no exception. It would enable exchange carriers to operate more efficiently and thereby provide savings for existing and future customers. Also, participation in PCS would help offset possible revenue reduction which could result from customer migration from landline to wireless services. If such losses occur and are not offset, the remaining landline customers would have to cover the fixed service costs. Another aspect of the benefits to customers of allowing exchange carriers to provide PCS is the virtual assurance that PCS would be offered in non-metropolitan parts of the country. Non-local exchange carrier providers of PCS will look to serve the most densely populated and more profitable areas first, leaving the isolated and less economically feasible regions unserved. It is vital that PCS be available to these non-metropolitan areas, both for the residents and for the economic development of those regions. The local exchange carriers have consistently demonstrated a commitment to service and have both the commitment and the ability to bring PCS to non-metropolitan areas quickly. For this reason, they should be allowed to offer PCS.

Local exchange carrier provision of PCS will also contribute to the competitive delivery of PCS. The level of interest in PCS by exchange carriers, both large and small, is evidenced by the number of experimental licenses for PCS filed by local exchange carriers and by their participation in this proceeding. This demonstrates that local exchange carriers would deploy PCS in their service areas. In so doing, they would provide expanded service offerings to their customers efficiently and economically. This would also result in opportunities for creative and adaptive PCS offerings. Taken together, these benefits of local exchange carrier provision of PCS should lead to enhanced competition by other providers and assure, as indicated above, that the infrastructure is adequately developed to foster PCS deployment.

In summary, local exchange carrier full participation in the provision of PCS would foster all four of the Commission's stated objectives for PCS.

A local exchange carrier's cellular holdings should not preclude it from providing PCS.

In seeking comment on local exchange carrier eligibility for PCS, the Commission refers to a possible bar by virtue of an exchange carrier's cellular holdings.⁷ In the discussion of cellular eligibility, the Commission proposes a severe ownership standard by which no party with an ownership interest exceeding one percent, direct or indirect, in a cellular license could have an ownership interest, direct or indirect, in a PCS license

⁷Notice at para. 76.

serving the same geographic area.⁸ The rationale for considering a cellular ownership prohibition for PCS is that cellular licensees could use their existing spectrum to provide PCS and that, if cellular licensees could acquire PCS licenses in their own service area, they could use them to inhibit competition.⁹

The effect of these policies, if adopted, would be to render any local exchange carrier ineligible for a PCS license if it holds virtually any interest in a cellular system serving its exchange area. Such a severe restriction is unwarranted. The Commission should take steps to eliminate this restriction. Home Telephone's local exchange service area lies in a portion of an MSA and a portion of an RSA. Because of this fact, Home Telephone has minority interests in the wireline cellular licensees for both areas. Specifically, in the MSA, a Home Telephone subsidiary is a minority general partner of the licensee. The majority general partner and manager of that cellular system is a subsidiary of a large telephone holding company. In the RSA, Home Telephone holds a minority interest in a cellular limited partnership that, in turn, holds a 50% general partnership interest in the licensee for the RSA. The other 50% general partner and manager of that cellular system is a subsidiary of a large telephone holding company. In both instances, Home Telephone has no control over the cellular systems. It cannot utilize the spectrum allocated to the cellular systems serving the MSA and RSA in which its local exchange service area lies to offer PCS-type service to its local exchange customers.

⁸Notice at fn. 46.

⁹Notice at paras. 64-66.

If a restriction on cellular participation is enacted, local exchange carriers such as Home Telephone would be totally cut out from the PCS market. Furthermore, their exchange customers would be penalized because they would not receive the advantage that their local exchange carrier could offer in bringing in the new PCS technology. The reasons for full local exchange carrier participation in PCS advanced by the Commission and Home Telephone are persuasive. The Commission should not turn around and disqualify local exchange carriers because they hold minority interests in cellular licensees. Such a result would be totally unjustified and inconsistent.

A spectrum reserve should be created for all local exchange carriers operating in RSAs and for smaller local exchange carriers operating in MSAs.

Local exchange carriers should participate in PCS as a means of assuring its deployment in all areas of the country. A very real need exists for the telecommunications infrastructure, including PCS, to be fully developed in non-metropolitan areas. The National Telecommunications and Information Administration ("NTIA") has specifically recognized the need to assure that such regions benefit from technological developments and do not suffer adverse economic and personal consequences.¹⁰

Furthermore, PCS is a new technology that local exchange carriers should be able to utilize in providing local exchange service. This is particularly critical in non-

¹⁰National Telecommunications and Information Administration, NTIA Telecom 2000 at p. 90 (1988).

metropolitan areas (i.e., RSAs and the outlying portions of many MSAs). The detrimental effect on exchange carriers serving these non-metropolitan areas, if they are unable to implement this technology, would be especially severe.

Home Telephone advocates that an adequate amount of spectrum be allocated for PCS and that licensees be permitted to apply for equal channel sets in each market. For the reasons stated above, the Commission should establish a spectrum reserve for local exchange carriers serving RSAs to obtain one of the licensed blocks in order to provide PCS in their own exchange areas. Under this plan, one block in each RSA would be assigned to the exchange carriers serving that RSA. Those exchange carriers would individually use the block within their exchange areas. Specified construction periods and service dates could be required. A condition could be imposed that exchange carriers use this spectrum only as a part of their exchange service operations and not be permitted to resell it separately. Adoption of this proposal would be especially beneficial to smaller exchange carriers in the RSAs, such as Home Telephone. They will not be able to compete realistically in any "aftermarket" to obtain licensed spectrum in their exchange area because they would not be able to pay what a licensee could demand for part of a broad licensed area.

For the same reasons that exchange carriers whose exchange service areas lie within RSAs should be granted a spectrum reserve, the smaller local exchange carriers that serve the outlying areas of many MSAs should be given the same consideration with regard to the spectrum reserve. Specifically, those carriers face the same difficulties in developing a telecommunications infrastructure as the smaller exchange

carriers in RSAs. Furthermore, those smaller local exchange carriers such as Home Telephone serving only a portion of an MSA area will also have the same difficulty in competing for a license to provide PCS in their portion or in attempting to obtain spectrum in the "aftermarket." Therefore, the Commission should consider such exchange carriers and include them under the proposed spectrum reserve.

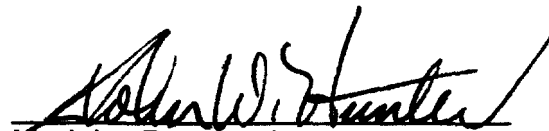
IV. Conclusion

Home Telephone urges the Commission to adopt PCS licensing areas that follow current MSAs and RSAs. Home Telephone also advocates that local exchange carriers be eligible to become PCS licensees and that interests in cellular systems not be a bar to such participation. In this regard, a spectrum reserve of one of the frequency blocks should be available for each local exchange carrier whose exchange area is in an RSA, with similar consideration given to smaller exchange carriers whose exchange areas are in MSAs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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